

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
C/A No.: 9:24-cv-99999

Larry Odom,

Plaintiff,

v.

Georgetown County School District, Keith  
Price, Bethany Giles, and William “Bill”  
Gaskins,

Defendants.

2:24-cv-6898-BHH-MHC

**DEFENDANTS’ ANSWERS TO LOCAL  
26.01 INTERROGATORIES**

NOW COME Defendants Georgetown County School District, Keith Price, Bethany Giles, and William “Bill” Gaskins (“Defendants”), by and through their undersigned counsel, and answers the Interrogatories set forth in Local Rule 26.01 of the Federal Rules of Civil Procedure as follows:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**ANSWER: None known.**

B. As to each claim, state whether it should be tried jury or non-jury and why.

**ANSWER: Plaintiff has requested a jury trial.**

C. State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) of more of the party’s stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

**ANSWER: Not applicable to these Defendants.**

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01

**ANSWER: The appropriateness of the division is not challenged.**

E. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**ANSWER: None known.**

F. [Defendants only.] If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**ANSWER: Not applicable**

G. [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

**ANSWER: None.**

Dated this the 26th day of November, 2024.

Respectfully submitted,

RICHARDSON PLOWDEN & ROBINSON, P.A.

/s/Eugene H. Matthews

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**COUNSEL FOR DEFENDANTS**